

Exhibit B



Deposition of:
Alfred Jones , Sr.

February 3, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

Veritext Legal Solutions

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In re Bard IVC Filters Products
Liability Litigation

NO. MD-15-02641

PHX-DGC

DEPOSITION OF
ALFRED JONES, SR.

February 3, 2017 - 10:08 a.m.

Ellis, Painter, Ratterree & Adams

2 E. Bryan Street

Savannah, Georgia

Deborah K. Lingonis, RPR, CCR 2883

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1 Q. Other than your attorneys and your wife, have
2 you talked to anyone else about this lawsuit?

3 A. No, sir, I have not.

4 Q. Have you talked to anyone else about this
5 deposition?

6 A. No, sir.

7 Q. Have you discussed this lawsuit with any of
8 Mrs. Jones' medical providers?

9 A. No, sir.

10 Q. And who are the attorneys representing you in
11 this case?

12 A. The attorneys that are sitting here today.

13 Q. And before filing this lawsuit, did you
14 contact any other attorneys?

15 A. No, sir.

16 Q. Before filing this lawsuit, have you seen any
17 television advertisements related to IVC filters?

18 A. No, sir.

19 Q. And why did you decide to file this lawsuit?

20 A. I never decided to file. I was worried about
21 my wife's health being she had this strut stuck in her
22 and was told that the procedure was supposed to be a
23 permanent procedure.

24 But then that happened, it broke, she had to
25 go back under and have it removed. And I just was

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1 looking for some answers.

2 Q. And were the attorneys here today the first
3 attorneys you contacted?

4 A. Yes, they were.

5 Q. And how did you find them?

6 A. I was looking on Facebook and a little
7 pop-up -- and when it popped up, that's what took my
8 mind back to thinking about my wife more so. And I was
9 wondering if I could get any further information about
10 filters, not looking to go as far as suing.

11 Q. And the pop-up was related to IVC filters
12 specifically?

13 A. IVC filters, and I think that was basically
14 all it was because it was just like a little pop-up
15 (indicating). It wasn't an ad. It was just a
16 (indicating).

17 Q. Do you recall what it said?

18 A. Not word for word, I don't. I just remember
19 it saying IVC filters, your loved one. Basically
20 something to the effect if you or a loved one had an
21 IVC filter that has broken, something to that effect.

22 Q. And did you click on a link or call a phone
23 number?

24 A. I actually clicked the link, but then it
25 didn't give me an actual, I'd say, website, so to

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1 speak. But it did show a number, so I wrote the number
2 down. And then when I got home, I called the number
3 and made the inquiry.

4 Q. Was that the first advertisement you had seen
5 regarding IVC filters?

6 A. Yes, it was.

7 Q. And can you state your current address for the
8 record, please.

9 A. 628 West 42nd Street, Savannah, Georgia
10 31415.

11 Q. And have you ever been known by any other
12 names?

13 A. No.

14 Q. And where did you grow up?

15 A. Here in Savannah.

16 Q. Were you born in Savannah too?

17 A. Technically, no.

18 Q. Where were you born?

19 A. In between here and New York.

20 Q. In between here and New York. How did that
21 happen?

22 A. My mother was coming south to visit and ended
23 up going into labor while she was on the train.

24 Q. Okay. Wow. Have you lived with anyone else
25 over the last ten years?